

Carolyn A. Taylor TBA #08526800/FIN 1290
Dominique Varner TBA #00791182/FIN 18805
Kristen Baker TBA #24073881
333 Clay 29th Floor
Houston, Texas 77002
Telephone (713) 759-0818
Telecopier (713) 759-6834
ATTORNEYS FOR CITIMORTGAGE, INC.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Case No. 11-36171
JACEY RAY JETTON	§	(Chapter 7)
FANNY TSUI LING JETTON	§	

**MOTION FOR ENTRY OF AGREED ORDER CONDITIONING AUTOMATIC
STAY [AND CO-DEBTOR STAY] REGARDING NON-EXEMPT PROPERTY REGARDING
969 SHEPHARD DRIVE, CORPUS CHRISTI, TEXAS 78412**

THIS IS A MOTION FOR ENTRY OF AN AGREED ORDER CONDITIONING THE AUTOMATIC STAY. IF YOU OBJECT TO THE GRANTING OF RELIEF, YOU SHOULD CONTACT THE MOVANT IMMEDIATELY TO TRY TO REACH AN AGREEMENT. IF YOU CANNOT REACH AN AGREEMENT, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO MOVANT WITHIN 14 DAYS OF THE DATE THIS WAS MAILED TO YOU. IF NO TIMELY OPPOSITION IS FILED, THE COURT MAY GRANT THE RELIEF WITHOUT A HEARING.

1. Movant: CITIMORTGAGE, INC.
2. Movant, directly or as agent for the holder, holds a security interest in
LOT ELEVEN (11), BLOCK THIRTEEN (13), CULLEN PLACE UNIT 1, A
SUBDIVISION OF THE CITY OF CORPUS CHRISTI, NUECES COUNTY,
TEXAS AS SHOWN BY THE MAP OR PLAT THEREOF RECORDED IN
VOLUME 17, PAGE 38, MAP RECORDS OF NUECES COUNTY, TEXAS TO
WHICH REFERENCE IS HERE MADE FOR ALL PERTINENT PURPOSES
3. The Debtor's exemptions ___ have X have not been allowed.
4. Type of collateral (e.g., Home, Manufactured Home, Car, Truck, Motorcycle): HOME
5. Debtor's scheduled value of property: \$78,377.00.
6. Movant's estimated value of property: \$78,377.00.
7. Total amount owed to Movant: \$84,841.71.
8. Estimated equity (paragraph 6 minus paragraph 7): \$-6,464.71.
9. Total pre and post-petition arrearages: \$4,825.96.
10. Total post-petition arrearages: \$4,825.96.

11. Amount of unpaid, past due property taxes, if applicable: NOT AVAILABLE AT THIS TIME.

12. Expiration date on insurance policy, if applicable: PROOF OF INSURANCE HAS NOT BEEN PROVIDED BY DEBTOR.

13. Movant and Debtor [and Co-Debtor, if applicable] have agreed to condition the automatic stay pursuant to the terms of the attached Agreed Order. Accordingly, the parties request entry of the agreed order.

Date: March 28 2012

Respectfully submitted:



Movant's Counsel Signature

Carolyn A. Taylor TBA #08526800/FIN 1290
Dominique Varner TBA #00791182/FIN 18805
Kristen Baker TBA #24073881
333 Clay 29th Floor
Houston, Texas 77002
Telephone (713) 759-0818
Telecopier (713) 759-6834
Email: KBAKER@HWALLP.COM
ATTORNEY FOR MOVANT

Certificate of Service and Certificate of Compliance with BLR 4001

A copy of this Motion was served on the persons shown on exhibit "1" at the addresses reflected on that exhibit on March 28, 2012 by electronic mail or by prepaid United States first class mail. Movant certifies that Movant has complied with Bankruptcy Local Rule 4001.



Carolyn A. Taylor TBA #08526800/FIN 1290
Dominique Varner TBA #00791182/FIN 18805
Kristen Baker TBA #24073881

Label Matrix for local noticing
0541-4
Case 11-36171
Southern District of Texas
Houston
Wed Mar 28 10:26:20 CDT 2012

4
United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

American Express
P.O. Box 650448
Dallas, TX 75265-0448

Cabela's CLUB Visa/
World's Foremost Bank
P.O. Box 82608
Lincoln, NE 68501-2608

Citi Cards/
Citibank (South Dakota), N.A.
P.O. Box 182564
Columbus, OH 43218-2564

Dell Financial Services/WebBank
P.O. Box 6403
Carol Stream, IL 60197-6403

Fanny Tsui Ling Jetton
1910 Mission Creek Circle
Houston, TX 77084-4797

Jacey Ray Jetton
1910 Mission Creek Circle
Houston, TX 77084-4797

SallieMae
P.O. Box 9500
Wilkes-Barre, PA 18773-9500

Tessa K. Laskowski
969 Shephard Drive
Corpus Christi, TX 78412-3568

(p)AMERICAN HONDA FINANCE
P O BOX 168088
IRVING TX 75016-8088

ACS
P.O. Box 371834
Pittsburgh, PA 15250-7834

Bank of America
P.O. Box 851001
Dallas, TX 75285-1001

Capital One Bank (USA), N.A.
P.O. Box 60599
City of Industry, CA 91716-0599

Citi Cards/
Citibank (South Dakota), N.A.
P.O. Box 6500
Sioux Falls, SD 57117-6500

Dell Financial Services/WebBank
P.O. Box 81577
Austin, TX 78708-1577

Fidelity National Indemnity
Insurance Company
P.O. Box 33003
St. Petersburg, FL 33733-8003

Keller Williams Coastal Bend/
Laura Commons
4518 Everhart Road, Suite 101
Corpus Christi, TX 78411-2779

SallieMae
P.O. Box 9533
Wilkes-Barre, PA 18773-9533

Toyota Financial Services
P.O. Box 4102
Carol Stream, IL 60197-4102

Recovery Management Systems Corporation
25 S.E. 2nd Avenue
Suite 1120
Miami, FL 33131-1605

ACS
P.O. Box 7051
Utica, NY 13504-7051

Cabela's CLUB Visa/
World's Foremost Bank
P.O. Box 82519
Lincoln, NE 68501-2502

Chase - amazon.com
P.O. Box 94014
Palatine, IL 60094-4014

CitiMortgage, Inc.
P.O. Box 689196
Des Moines, IA 50368-9196

Elite Women Care Center, P.A.
23920 Katy Freeway, Suite 470
Katy, TX 77494-1346

Fidelity National Indemnity
Insurance Company
P.O. Box 33070
St. Petersburg, FL 33733-8070

Memorial Hermann
Patient Business Services
P.O. Box 4370
Houston, TX 77210-4370

State Farm Bank
P.O. Box 3299
Milwaukee, WI 53201-3299

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Wells Fargo Home Mortgage
P.O. Box 660455
Dallas, TX 75266-0455

Wells Fargo Visa
P.O. Box 30086
Los Angeles, CA 90030-0086

Margaret Maxwell McClure
Attorney at Law
909 Fannin
Suite 3810
Houston, TX 77010-1030

W Steve Smith
McFall, Breitbeil & Smith, PC
1331 Lamar Street
Ste 1250
Houston, TX 77010-3027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

AMERICAN HONDA FINANCE CORPORATION
POB 168088
Irving, TX 75016-8088

(d)AMERICAN HONDA FINANCE CORPORATION
NATIONAL BANKRUPTCY CENTER
P.O. BOX 168088
IRVING, TX 75016-8088

(d)American Honda Finance Corp.
P.O. Box 168008
Irving, TX 75016

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Recovery Management Systems Corporation
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

(u)efiled POC 11/29/2011

(d)Fanny Tsui Ling Jetton
1910 Mission Creek Circle
Houston, TX 77084-4797

(d)Jacey Ray Jetton
1910 Mission Creek Circle
Houston, TX 77084-4797

End of Label Matrix
Mailable recipients 33
Bypassed recipients 4
Total 37